

EXHIBIT B

**Certification of Charles H. Mullin, Ph.D.
In Support of Application for Retention of Bates White, LLC, Effective as of April 4, 2023**

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

Paul R. DeFilippo, Esq.
500 Fifth Avenue
New York, New York 10110
Telephone: (212) 382-3300
Facsimile: (212) 382-0050
pdefilippo@wmd-law.com

JONES DAY

Gregory M. Gordon, Esq.
Brad B. Erens, Esq.
Dan B. Prieto, Esq.
Amanda Rush, Esq.
2727 N. Harwood Street
Dallas, Texas 75201
Telephone: (214) 220-3939
Facsimile: (214) 969-5100
gmgordon@jonesday.com
bberens@jonesday.com
dbprieto@jonesday.com
asrush@jonesday.com
(Admitted *pro hac vice*)

PROPOSED ATTORNEYS FOR DEBTOR

In re:	Chapter 11
LTL MANAGEMENT LLC, ¹	Case No.: 23-12825 (MBK)
Debtor.	Judge: Michael B. Kaplan

**CERTIFICATION OF CHARLES H. MULLIN, PH.D.
IN SUPPORT OF APPLICATION FOR RETENTION
OF BATES WHITE, LLC, EFFECTIVE AS OF APRIL 4, 2023**

I, Charles H. Mullin, Ph.D., being of full age, certify as follows:

1. Bates White is seeking authorization to be retained as talc consultants and experts for the Debtor in this Chapter 11 Case, and I make this certification in support of the *Application for Retention of Bates White, Effective as of April 4, 2023* (the “Application”).² Bates White will render economic consulting, claims valuation and

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² Capitalized terms used herein but not otherwise defined have the meaning given to them in the Application.

related services to the Debtor as needed in connection with talc personal injury claims against the Debtor and related potential costs and liabilities.

2. My professional credentials include more than 20 years of experience in providing expert testimony and guidance on litigation and business matters, including having authored more than 75 expert reports. Included among the matters in which I have provided or am currently providing mass tort related expert testimony or related services are the asbestos-related bankruptcy cases of Aldrich Pump LLC, DBMP LLC, Leslie Controls Inc., Motors Liquidation Company, Owens Corning, Plant Insulation Company, Specialty Products Holding Corp. (Bondex), and Thorpe Insulation Company. In addition, I have testified in numerous asbestos-related insurance and reinsurance coverage disputes and provided analysis related to valuation in bankruptcies involving other mass torts, such as, Aearo Technologies LLC (relating to allegedly defective ear protection), Blitz U.S.A., Inc. (relating to allegedly defective gas cans), Chemtura Corporation (relating to food and beverage additive diacetyl), Imerys (relating to claims allegedly caused by talc exposure), and TK Holdings (relating to defective airbags). A copy of my curriculum vitae is attached hereto as Exhibit 1.

3. I am the Managing Partner of Bates White, which maintains offices at 2001 K Street NW, North Building, Suite 500, Washington, DC 20006. I am duly authorized to make this certification on behalf of Bates White.

4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows:

Bates White is willing to continue to provide talc consultant and expert services for the Debtor and has agreed to accept as compensation sums as may be allowed by the Court. Bates White understands that interim and final fee awards are subject to approval by this Court.

The Engagement Letter specifies that the Bates White retention is through Jones Day, as proposed counsel to the Debtor, who will provide direction as to the scope and type of services Bates White is to provide. In any event, however, the Debtor is solely responsible for the payment of services rendered and costs incurred by Bates White under the terms of the Engagement Letter. See Ex. A, Engagement Letter ¶ 3.

As noted above, Bates White served as talc consultants for the former Old JICI and J&J in Imerys. Pursuant to the Prior Retention Order, Bates White served in such role for the Debtor. Bates White continues to serve in such role for J&J and now the Debtor on the terms of an engagement agreement entered into by Bates White and Weil. Bates White's fees and expenses in Imerys will continue to be billed pursuant to that engagement agreement, the terms of which are substantially similar to the terms contained in the Engagement Letter, and reflected in a separate time category for record-keeping purposes. To the extent that Bates White provides services solely to either J&J or the Debtor in Imerys, Bates White will allocate 100% of such fees and expenses to the entity for whom services are provided. To the extent that Bates White provides services to both

the Debtor and J&J, Bates White will allocate 50% of such fees and expenses to the Debtor and 50% of such fees and expenses to J&J.

In this Chapter 11 Case, Bates White's services will be provided solely to the Debtor, and accordingly, all such fees and expenses will be charged to the Debtor as set forth in the Engagement Letter and herein. For an avoidance of doubt, Bates White has not and will not provide any services to J&J in connection with this Chapter 11 Case.

Bates White has provided its hourly rates below for work in this case as follows:

<u>Billing Category</u>	<u>Range</u>
<i>Partner</i> (Dr. Charles Mullin)	\$1,375
<i>Partner</i>	\$750-\$2,000
<i>Principal</i>	\$625-\$825
<i>Managing Economist</i>	\$600-\$725
<i>Managing Consultant</i>	\$550-\$700
<i>Senior Economist</i>	\$550-\$625
<i>Senior Consultant</i>	\$480-\$550
<i>Economist</i>	\$500-\$550
<i>Consultant II</i>	\$425-\$465
<i>Consultant</i>	\$395-\$410
<i>Data Specialist</i>	\$280
<i>Project Coordinator</i>	\$280
<i>Project Assistant</i>	\$230

Bates White's hourly billing rates are subject to periodic adjustments to reflect economic and other conditions and promotions; however, such rates may be adjusted only with the consent of the Debtor. See Ex. A, Engagement Letter ¶ 8.

In addition, also subject to approval by this Court, Bates White shall submit for reimbursement all of its reasonable out-of-pocket expenses in connection with this Chapter 11 Case. Bates White has agreed to receive compensation and reimbursement in accordance with its standard billing practices, the provisions of the Engagement Letter, sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, the Guidelines, any Interim Compensation Order and any other applicable orders of this Court.

The Engagement Letter, specifies that any dispute arising between Bates White and Jones Day or the Debtor will be determined by binding arbitration in Washington, DC. See Ex. A, Engagement Letter ¶ 14. Notwithstanding this provision, Bates White has agreed that the bankruptcy court shall hear and adjudicate any such dispute during the pendency of the Chapter 11 Case.

The Engagement Letter specifies that the parties thereto shall not be liable to one another for substantially all indirect, special, consequential or exemplary damages. See Ex. A, Engagement Letter ¶ 17. The Engagement Letter also limits the liability of Bates White

for direct damages to the amount of fees paid with respect to services performed under the Engagement Letter. Id. Notwithstanding such provision, Bates White's liability will not be limited or released by the Engagement Letter for any claim or expense where: (a) such claim or expense is judicially determined to have arisen from Bates White's gross negligence, willful misconduct, fraud or bad faith; (b) with respect to a contractual dispute in which the Debtor alleges the breach of Bates White's contractual obligations, the Court determines that such release or limitation would not be permissible under applicable law; or (c) such claim or expense is settled prior to a judicial determination under (a) or (b), but determined by this Court, after notice and a hearing, to be a claim or expense for which Bates White should not have its liability released or limited under the terms of the Engagement Letter.

The Engagement Letter also permits the Debtor, Jones Day or Bates White to terminate the agreement upon seven days written notice. See Ex. A, Engagement Letter ¶ 19.

The terms of Bates White's employment and compensation as described in this Certification, the Engagement Letter and the Application are consistent with employment and compensation arrangements typically entered into by Bates White when providing such advisory services and, to the best of our knowledge, are competitive with those arrangements entered into by other economic consulting firms when rendering comparable services.

Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

- None
- Describe connection: See no. 6 below.

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

- None
- Describe Connection:

Through Jones Day, the Debtor has provided Bates White a list of potentially interested parties in the Chapter 11 Case (the "Interested Parties"). To the extent that information was available, we undertook a detailed, good faith search to determine and to disclose, as set forth herein, whether we have provided or currently provide consulting services to any

significant creditors, insiders or other parties in interest identified by such list in any substantively unrelated matters. The identities of the Interested Parties are set forth on Exhibit 2 hereto.

In preparing this Certification, our staff, under my direction and control, searched our database containing the names and matter descriptions of current and previous engagements handled by our firm over the past ten years. To the extent the information is available, the search request identified parties to whom Bates White has provided or currently provides services that also are Interested Parties, which included significant creditors of the Debtor, significant professional advisors to the Debtor and other potential parties in interest in this Chapter 11 Case.

To the best of my knowledge and belief, Bates White has provided, or is currently providing, consulting services to certain creditors of the Debtor (or affiliates of creditors of the Debtor), equity security holders or other parties in interest in matters unrelated to the Debtor or the Chapter 11 Case, as described on Exhibit 3 to this Certification.

In addition, as described in Exhibit 3, and as noted above, Bates White was retained to provide consulting services to the Debtor and J&J in connection with Imerys, and is currently continuing to provide such services at the direction of Weil.

In addition, Bates White was previously retained by J&J in a consulting capacity with regard to litigation pending in the United States District Court of New Jersey styled *Daniel Edley, et al. v. Johnson & Johnson, et al.*, Civil Action No. 3:22-cv-2970-FLW-TJB (the “Edley Action”). My understanding is that any interests the Debtor may have in the Edley Action are not adverse to the interests of J&J in the Edley Action.

Bates White is not, and was not, within two years before the Petition Date, a director, officer or employee of the Debtor.

If Bates White discovers additional information that requires disclosure, we will promptly file a supplemental disclosure with the Court.

With regard to compensation prior to the Petition Date, the Debtor paid Bates White for its services in connection with the 2021 Chapter 11 Case pursuant to the interim compensation order entered in that case throughout the pendency of the 2021 Chapter 11 Case.

On April 4, 2023, following the entry of the Dismissal Order and prior to the commencement of this Chapter 11 Case, Bates White received payment from the Debtor of all unpaid actual and estimated fees and expenses incurred through the commencement of this Chapter 11 Case.

In particular, following the entry of the Dismissal Order, on April 4, 2023, the Debtor paid Bates White \$1,829,466.10 via wire transfer (the “Payment”). This amount comprises of (a) \$1,529,466.10 on account of actual and estimated fees and expenses incurred but not yet paid in the 2021 Chapter 11 Case through the entry of the Dismissal Order (the “Pre-Dismissal Amounts”), and (b) \$300,000.00 for Bates White’s estimated

fees and expenses incurred following dismissal of the 2021 Chapter 11 Case and prior to the commencement of this Chapter 11 Case (the “Post-Dismissal Amounts”).

This payment to Bates White was made in accordance with the terms of the Dismissal Order, which provides that a Retained Professional (as defined therein) may “seek final allowance and payment of compensation and reimbursement of expenses” in accordance with the procedures set forth in the Dismissal Order, which procedures included serving “a statement of all of its unpaid fees and expenses incurred in [the 2021] Chapter 11 Case through the Dismissal Date” on the Debtor “no later than 45 days following the Dismissal Date.” Dismissal Order, ¶ 5. Bates White served such a statement on the Debtor.³

In addition, the Debtor was solvent at the time it made this payment to Bates White. See LTL, 64 F.4th at 108 (“LTL, at the time of its filing, was highly solvent with access to cash to meet comfortably its liabilities as they came due for the foreseeable future.”); see also Apr. 18, 2023 Hr’g Tr. 62:21-25 (the Debtor’s chief legal officer testifying that Holdco, the party to the funding agreement with the Debtor, is valued at around \$30 billion); id. at 207:3-4 (counsel for the Debtor reiterating that the value of Holdco is \$30 billion).

The Payment was applied to all of Bates White’s Pre-Dismissal Amounts and Post-Dismissal Amounts. Accordingly, as of the Petition Date, Bates White was not owed any amounts by the Debtor. Following the Petition Date, Bates White reconciled the Payment against actual fees and expenses incurred. Following such reconciliation, Bates White now holds \$347,805.00 in retainer (the “Retainer”). Bates White shall apply this Retainer to fees and expenses incurred from and after the Petition Date consistent with the terms of any Interim Compensation Order, but Bates White will not apply any portion of the Retainer unless and until authorized to do so by a further order of this Court, including any Interim Compensation Order.

No promises have been received by Bates White as to compensation in connection with this Chapter 11 Case other than as outlined in this Certification and the Application in accordance with the provisions of the Bankruptcy Code. Bates White has no agreement with any other entity to share any compensation received.

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

- do not hold an adverse interest to the estate.
- do not represent an adverse interest to the estate.
- are disinterested under 11 U.S.C. § 101(14).
- do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).

³ On April 27, 2023, the Debtor filed a motion for authorization to satisfy the fees and expenses of the other estate professionals involved in the 2021 Chapter 11 Case per the terms of the Dismissal Order. See Dkt. 319.

Other. Explain:

8. If the professional is an auctioneer,
 - a. The following are my qualifications and experience with the liquidation or sale of similar property: N/A
 - b. The proposed method of calculation of my compensation, including rates and formulas, is: N/A
 - c. The following is an estimate of all costs and expenses, including labor, security, advertising, delivery, mailing, and insurance, for which I will seek reimbursement from the sale proceeds: N/A
 - d. Have you, or a principal of your firm, been convicted of a criminal offense?
 No Yes (explain below)
 - e. I certify that a surety bond as described in D. N. J. LBR 2014-2(a)(6) is in effect and will remain so through the date of turnover of the auction proceeds.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of the property is as follows: N/A

I certify under penalty of perjury that the above information is true.

Date: May 4, 2023
Washington, DC

/s/ Charles H. Mullin
Charles H. Mullin, Ph.D.
Bates White, LLC
2001 K Street NW
North Building, Suite 500
Washington, DC 20006
Telephone: (202) 408-6110
Facsimile: (202) 408-7838

EXHIBIT 1

Charles H. Mullin, Ph.D. Curriculum Vitae

CHARLES H. MULLIN, PHD

Partner

AREAS OF EXPERTISE

- [Data analysis](#)
- [Econometrics](#)
- [Economic modeling](#)
- [Insurance allocation](#)
- [Microsimulation modeling](#)
- [Statistical analysis](#)



SUMMARY OF EXPERIENCE

Charles H. Mullin is the Bates White Managing Partner. He provides advice and expert analysis on issues involving mass torts, class actions, bankruptcies, insurance coverage, and due diligence for mergers, acquisitions, and spin-offs. He is a recognized expert on statistical and data analysis, econometrics, economic and microsimulation modeling, sample design, insurance allocation, and the valuation of mass torts. *Who's Who Legal* named him Insurance Expert of the Year on three occasions, and he has been a *Who's Who Legal* Insurance and Reinsurance Expert Witness Thought Leader since 2016 and Global Elite Thought Leader since 2018. Dr. Mullin has authored more than 75 expert reports and provided expert testimony in more than 50 matters, as well as provided due diligence reports for corporate transactions. He has more than 20 years of experience providing this expertise in both the private and public sectors.

He taught courses in statistics, econometrics, and labor economics while on the faculty in the Department of Economics at Vanderbilt University and at the University of California at Los Angeles. Dr. Mullin has published papers on applied and theoretical econometrics and labor economics in peer-reviewed journals, and he is frequently invited to speak at industry conferences.

EDUCATION

- PhD, Economics, University of Chicago
- BA, Mathematics and Economics, University of California at Berkeley

SELECTED EXPERIENCE

- Authored expert report, provided deposition testimony, and provided hearing testimony on behalf of the Debtors in *In re: Aearo Technologies LLC, et al.*, No. 22-02890-JJG-11 (Bankr. S.D. Ind.): 2022–present.
- Assessed the value of pending and future asbestos-related personal-injury claims on behalf of the Debtor in *In re HONX, Inc.*, No. 22-90035 (MI) (Bankr. S.D.T.X.): 2022–present.

- Authored expert report and provided deposition testimony on behalf of multiple insurance companies in *AmerisourceBergen Drug Corporation, et al., v. ACE American Insurance Co., et al.*, No. 17-C-36 (W.V. Cir. Ct., Boone Cnty): 2021–present.
- Authored expert report, provided deposition testimony, and provided hearing testimony on behalf of the Debtor in *In re LTL Management LLC*, No. 21-30589 (MBK) (Bankr. D.N.J.) (formerly No. 21-30589 (JCW) (Bankr. W.D.N.C.)): 2021–present.
- Authored expert report, provided deposition testimony, and provided hearing testimony in *In re: Mallinckrodt PLC, et al.*, No. 20-12522 (Bankr. D. Del.): 2021.
- Authored expert report and provided deposition testimony in *Kevin Brown et al. v. Saint-Gobain Performance Plastics Corporation and Gwenael Busnel*, No. 1:16-cv-00242 (U.S. Dist. Ct. D. N.H.): 2020–present.
- Authored expert report, provided deposition testimony, provided hearing testimony on behalf of the Debtors in *In re Aldrich Pump LLC, et al.*, No. 20-30608 (Bankr. W.D.N.C.): 2020–present.
- Assessed the value of pending and future abuse claims on behalf of the Debtors in *In re: Boy Scouts of America and Delaware BSA, LLC*, No. 20-10343 (Bankr. D. Del.): 2020–present.
- Assessed the value of pending and future asbestos-related personal-injury claims on behalf of the Debtors in *In re DBMP, LLC*, No. 20-30080 (Bankr. W.D.N.C.): 2020–present.
- Assessed the value of pending and future asbestos-related personal-injury claims on behalf of the Debtors in *In re Paddock Enterprises, LLC*, No. 20-10028 (Bankr. D. Del.): 2020–2022.
- Authored expert report and provided deposition testimony on behalf of the Johnson & Johnson in *In re: Imerys Talc America, Inc., et al.*, No. 19-10289 (Bankr. D. Del.): 2019–present.
- Authored presentation for investor group and provided model of potential losses related to bodily-injury claims alleged related to agricultural pollutant: 2019.
- Retained on behalf of the Debtors in *In re Purdue Pharma L.P., et al.*, No. 19-23649 (Bankr. S.D.N.Y.): 2019–present.
- Authored expert report in *In re Midwest Generation, LLC, et al.*, No. 12-49218 (Bankr. N.D. Ill.): 2019.
- Provided testimony in PERB Interest Arbitration between PBA and the City of New York: 2019–2023.
- Authored expert report and provided deposition testimony on behalf of excess insurers in *In re Kaiser Gypsum Company, Inc., et al.*, No. 16-31602 (Bankr. W.D.N.C.): 2018–2021.
- Authored expert report in *Consumer Financial Protection Bureau v. Navient Corporation and Navient Solutions, Inc.*, No. 3:17-cv-00101 (M.D. Pa., Jan. 18, 2017). 2018–present.
- Authored expert report and provided deposition testimony in *Keyes Law Firm v. Napoli Bern Ripka Shkolnik, LLP, et al.*, No. 1:17-cv-02972 (U.S. Dist. Ct. D. Md.): 2018–2020.
- Authored expert report and provided deposition testimony in *St. Paul Surplus Lines Insurance Company v. Wright Medical Group, Inc., et al.*, No. CH-14-0927 (Tn. Ch. Ct. 13th Jud. Dist. Memphis): 2018–2019.
- Authored expert report, provided deposition testimony, and testified in *Cannon Electric, Inc., now known as ITT Cannon, Inc., et al. v. ACE Property and Casualty Company, et al.*, No. BC 290354 (Super. Ct. Cal. L.A. Cnty. Ct.): 2018.
- Assessed the value of pending and future asbestos-related personal-injury claims on behalf of the Debtors in *In re Bestwall, LLC*, No. 17-31795 (Bankr. W.D.N.C.): 2017–present.

- Assessed the value of pending and future airbag-related personal-injury claims on behalf of automobile manufacturers in the matter of *In re: TK Holdings Inc., et al.*, No. 17-11375 (Bankr. D. Del.) and related proceedings: 2017–2018.
- Authored expert reports and testified in *James D. Sullivan et al. v. Saint-Gobain Performance Plastics Corporation*, No. 5:16-cv-00125 (U.S. Dist. Ct. D. Vt.): 2017–2019.
- Authored expert report, provided deposition testimony, and testified in *In re the Receivership of Fraser's Boiler Service, Inc.*, No. 15-2-01791-8 (Wash. Super. Ct., King Cnty.): 2017.
- Authored expert report in *Gerrit H. Brouwer et al. v. Wyndham Vacation Resorts, Inc. et al.*, No. 2014-CA-008533 (Fl. Cir. Ct. 9th Jud. Cir. Orange Ct.): 2017–2022.
- Authored expert report in *Ernest Yaeger, Jr. et al. v. Wyndham Vacation Resorts, Inc. et al.*, No. 2014-CA-008054 (Fl. Cir. Ct. 9th Jud. Cir. Orange Ct.): 2017–2022.
- Authored declarations and testified in a reinsurance arbitration: 2017–2022.
- Authored declaration and reports, provided deposition testimony, and testified in a reinsurance arbitration: 2016–present.
- Analyzed coverage issues on behalf of Columbia Casualty Co. regarding pharmaceutical-based losses: 2016.
- Authored expert reports on behalf of HDI-Gerling Industrial Insurance Co. regarding pharmaceutical-based losses: 2015–2016.
- Authored expert report and declaration and provided deposition testimony in *Appleton Papers Inc. & NCR Corp. v. George A. Whiting paper Co. et al.*, No. 08-C-16 (U.S. Dist. Ct. E.D.WI): 2015–2017.
- Authored expert reports on behalf of ACE Bermuda insurance Ltd. regarding an arbitration claim by 3M Company regarding allegedly defective masks and respirators against Bermuda-Form policies: 2015–2016.
- Authored expert report on behalf of Allstate Insurance Company regarding an insurance contribution claim in *Certain Underwriters at Lloyd's London v. Allstate et al.*, No. C101-1674 (Ohio Ct. Com. Pl., Lucas Cnty.): 2015–2016.
- Analyzed coverage issues stemming from agricultural-related water contamination claims: 2015–2018.
- Analyzed coverage issues stemming from MTBE-related claims filed: 2015–2018.
- Authored expert report and provided deposition testimony in *Direct General Ins. Co. v. Indian Harbor Ins. Co.*, No. 1:14-CV-20050 (S.D. Fla.): 2015.
- Authored expert report, provided deposition testimony, and testified during arbitration on behalf of General Re Corporation and SCOR SE in a reinsurance matter: 2014–2017, 2018–2021.
- Analyzed coverage issues stemming from Benzene claims filed in *Radiator Specialty Company vs. Arrowood Indemnity Company et al.*, No. 13 CVS 2271 (NC Super. Ct. Mecklenburg Cnty.): 2014–2015.
- Coauthored letters supporting the approximately \$700 million international legacy asbestos liability and related insurance valuations for the newly combined AMEC Foster Wheeler across US GAAP and IFRS accounting frameworks, as well as periodic updates to said analyses: 2014–2020.
- Authored declaration on behalf of insurance companies in *A/IU Ins. Co. v. Philips Elecs. N. Am. Corp.*, No. 9852 (Del. Ch.): 2014–2015.

- Authored declaration on behalf of insurance companies in *In re T.H. Agric. & Nutrition, LLC*, No. 08-14692 (Bankr. S.D.N.Y.): 2014.
- Analyzed coverage issues stemming from environmental loss in *Olin Corporation v. Insurance Company of North America et al.*, No. 84 CIV. 1968 (TPG) (U.S. Dist. Ct. S.D.N.Y.): 2014–2015.
- Provided legacy liability valuation report that parsed liability for a large-scale energy generator across specific facilities and over time: 2014.
- Authored expert report, provided deposition testimony, and testified during arbitration on behalf of Allstate Insurance Company in a reinsurance matter: 2013–2015.
- Provided deposition testimony on behalf of National Indemnity Company in *Nat'l Indem. Co. v. State*, No. XDDV 2012-140 (Mont. Dist. Ct., Lewis & Clark Cnty.): 2013–2018.
- Authored expert report, provided deposition testimony, and testified on behalf of insurance companies in *Nooter Corp. v. Allianz Underwriters Ins. Co.*, No. 1022-CC01145-01 (Mo. Cir. Ct. 22nd Jud. Cir. St. Louis City): 2013–present.
- Coauthored expert report, provided deposition testimony, and testified on behalf of multiple insurance companies in *In re Blitz U.S.A.*, No. 11-13603 (PJW) (Bankr. D. Del.): 2013–2014.
- Provided deposition testimony on behalf of The Hartford Accident and Indemnity Company in the matter *Fluor Corp. v. Hartford Accident & Indem. Co.*, No. 06CC00016 (Cal. Super. Ct., Orange Cnty.): 2013.
- Authored expert report on behalf of The Hartford Accident and Indemnity Company in the matter *Hartford Accident & Indemnity Co. v. Travelers Indem. Co.*, No. X07-HHD-CV-11-6021732-S (Conn. Super. Ct., Hartford Cnty.): 2013–2015.
- Provided deposition and trial testimony on behalf of The Travelers Indemnity Company in *US Silica Co. v. ACE Fire Underwriters Ins. Co.*, No. 06-C-2 (W. Va. Cir. Ct., Morgan Cnty.): 2013.
- Authored expert report and testified during arbitration proceedings on behalf of the Massachusetts Insurance Insolvency Fund in *In re the Liquidation of Midland Ins. Co.*, No. 41294/86 (N.Y. Sup. Ct.): 2012–2013.
- Authored expert report, provided deposition testimony, and testified at trial on behalf of Defendant in *Cannon Elec., Inc. v. Affiliated FM Ins. Co.*, No. BC 290354 (Cal. Super. Ct., L.A. Cnty.): 2012–2013.
- Authored expert report and provided deposition testimony on behalf of multiple insurance companies in *Goodrich Corp. v. A.G. Securitas et al.*: 2013–2015.
- Authored expert reports and testified during arbitration proceedings on behalf of Munich Re regarding pharmaceutical-based losses: 2011–2013.
- Authored expert report on behalf of Zurich International (Bermuda) Ltd. in a Wellington ADR: 2011.
- Authored expert reports, provided deposition testimony, and testified during arbitration on behalf of Liberty Mutual Insurance Company in a series of related reinsurance arbitration matters: 2011–2013.
- Authored expert reports and declarations, provided deposition testimony, and testified during the confirmation hearing on behalf of multiple insurance companies in *In re Plant Insulation Co.*, No. 09-31347 (Bankr. N.D. Cal.): 2011–2014.
- Provided consulting services for a coalition of direct action plaintiffs in *In re Puerto Rican Cabotage Antitrust Litigation*.

- Analyzed liability and damages resulting from the indirect claim on behalf of a large coalition of direct-action plaintiffs in the United States, Asia, and Europe in *In re TFT-LCD (Flat Panel) Antitrust Litig.*, MDL No. 1827 (N.D. Cal.): 2011–2015.
- Authored expert reports, provided deposition testimony, and testified assessing the value of pending and future asbestos-related personal-injury claims on behalf of the Debtors in *In re Specialty Prods. Holding Corp.*, No. 10-11780 (Bankr. D. Del.): 2010–2015.
- Assessed the value of pending and future asbestos-related personal-injury claims on behalf of the Debtors in *In re Garlock Sealing Techs., LLC*, No. 10-BK-31607 (Bankr. W.D.N.C.): 2010–2018.
- Assisted a Fortune 500 company in the completion of a limited portfolio transfer of thousands of asbestos claims to a major insurance company: 2010–2011.
- Authored declaration and provided deposition testimony on behalf of multiple insurance companies in *In re Leslie Controls, Inc.*, No. 10-12199 (Bankr. D. Del.): 2010–2011.
- Authored declarations on behalf of Century Indemnity Company in *In re Thorpe Insulation Co.*, No. CV 10-1493 (Bankr. C.D. Cal.): 2010–2011.
- Assessed the value of pending and future asbestos-related personal-injury claims on behalf of the Official Committee of Unsecured Creditors in *In re Motors Liquidation Co.*, No. 09-50026 (Bankr. S.D.N.Y.): 2010–2011.
- Assessed the value of diacetyl claims on behalf of the Official Committee of Equity Security Holders in *In re Chemtura Corp.*, No. 09-11233 (Bankr. S.D.N.Y.): 2010.
- Provided deposition and trial testimony in *Cannon Electric, Inc., now known as ITT Cannon, Inc., et al. v. Affiliate FM Insurance Company, et al.*, No. BC 290354 (Super. Ct. Cal. L.A. Cty. Ct.) Goulds: 2009–2017.
- Authored expert report on behalf of FM Global and Utica in an arbitration matter: 2009–2010.
- Authored expert reports and provided deposition testimony on behalf of Aviva Insurance Company in *Flintkote Co. v. Gen. Accident Assurance Co. of Can.*, No. C04-01827 (N.D. Cal.): 2009–2010.
- Provided deposition testimony on behalf of NL Industries, Inc., in *Brown v. NL Indus., Inc.*, No. 06-602096-CZ (Mich. Cir. Ct., Wayne Cnty.): 2009–2010.
- Authored expert report on behalf of taxpayers in *Cencast Servs., L.P. v. United States*, Nos. 02-1916 T through 02-1925 T (Fed. Cl.): 2009–2012.
- Authored declaration on behalf of the State of Israel in *In re Holocaust Victim Assets Litig.*, No. 09-160 (ERK)(JO) (E.D.N.Y.): 2009–2010.
- Provided deposition testimony on behalf of multiple insurance companies in the matter *State of Minnesota v. Associated Medical Assurance Ltd.*, No. 27-CV-08-1912 (Minn. Dist. Ct., Hennepin Cnty.): 2008–2010.
- Authored expert reports, provided deposition testimony, and testified on behalf of multiple insurance companies in *Continental Casualty Co. v. BorgWarner Inc.*, No. 04 CH 01708 (Ill. Cir. Ct., Cook Cnty.): 2007–present.
- Authored expert reports, provided deposition testimony, and testified on behalf of multiple insurance companies in *Continental Ins. Co. v. Honeywell Int'l., Inc.*, No. MRS-L-1523-00 (N.J. Super. Ct., Morris Cnty.): 2007–2018.

- Authored expert report and provided deposition testimony on behalf of insurance company in *Nat'l Serv. Indus., Inc. v. Appalachian Ins. Co.*, No. E-22807 (Ga. Super. Ct., Fulton City): 2007.
- Authored expert report, provided deposition testimony, and testified on behalf of policyholder in *Imo Indus., Inc. v. Transamerica Corp.*, No. L-2140-03 (N.J. Super. Ct., Mercer Cnty.): 2007–2011.
- Authored expert report and provided deposition testimony on behalf of insurance company in *Degussa Corp. v. Century Indem. Co.*, No. UNN-L-2163-03 (N.J. Super. Ct., Union Cnty.): 2007.
- Authored expert report and provided deposition testimony on behalf of insurance joint defense group in *Foster Wheeler LLC v. Affiliated FM Ins. Co.*, No. 600777/01 (N.Y. Sup. Ct., N.Y. Cnty.): 2007–2011.
- Authored expert reports, provided deposition testimony, and testified on behalf of Argonaut Insurance Company in several reinsurance arbitrations: 2006–2007.
- Coauthored a report on the economic viability of the Trust Fund proposed under S.852, the Fairness in Asbestos Injury Resolution (FAIR) Act of 2005, which highlights how compensation criteria specified for the proposed Fund would change the number and composition of claims relative to the current tort environment: 2005.
- Authored due diligence reports on asbestos, silica, opioids, and other mass tort matters for corporate transactions that assessed potential future tort expenditures and evaluated the insurance assets that may provide coverage for those tort expenditures: 2005–present.
- Authored expert reports and provided deposition testimony assessing the Trust-based liquidated values and insurance allocation on behalf of Plaintiff in *Nat'l Union Fire Ins. Co. of Pittsburgh, Pa. v. Porter Hayden Co.*, No. 1:03-CV-03408 (D. Md.): 2004–2015.
- Authored expert report and provided deposition testimony to address the fraction of expenditures associated with a company's asbestos installation operations on behalf of Defendants in *Owens Corning v. Birmingham Fire Ins. Co. of Pa.*, No. C10200104929 (Ohio Ct. Com. Pl., Lucas Cnty.): 2003–2005.
- Authored expert report focused on the design and implementation of claims file samples in *Hercules Inc. v. OneBeacon Am. Ins. Co.*, No. 02C-11-237 (Del. Super. Ct., New Castle Cnty.): 2004.
- Assisted with settlement negotiations by analyzing the total value of a national refractory company's products and nonproducts coverage associated with claims for both asbestos and potential silica liabilities.
- Evaluated future liabilities and projected insurance recoveries under various scenarios, such as geographic constraints regarding a regional insulation contractor and supply company.
- Served on behalf of the US Department of Labor in providing statistical analysis for discriminatory hiring cases and assessing damages.
- Analyzed demand-side management programs for utility companies. Evaluated different contract structures, software development options, and returns on subsidization programs.
- Investigated potential collusion and redlining by auto-insurance companies on behalf of the Office of the Chicago Mayor.

OTHER PROFESSIONAL EXPERIENCE

Prior to joining Bates White, Dr. Mullin worked at Chicago Partners, where he provided damages assessments for antitrust matters. Previously, he worked at Quantum Consulting, where he conducted demand-side management for utility companies, and at Litigation Resolution Group, where he assessed mass tort liabilities. In addition to his

industry experience, Dr. Mullin was on the faculty in the Departments of Economics at Vanderbilt University and the University of California at Los Angeles.

INDUSTRY PRESENTATIONS

- “Update on Talc Litigation.” Perrin Conferences—National Asbestos Litigation Conference, October 1, 2018.
- “Corporate Roundtable: In-House Perspectives on Asbestos Litigation.” Perrin Conferences—Asbestos Litigation Conference: A National Overview & Outlook, September 13, 2016.
- “Emerging Risks & Insurance Issues in 2016 Coverage Litigation.” Perrin Conferences—Emerging Insurance Coverage & Allocation Issues Conference, May 18, 2016.
- “Impact of Bankruptcies on Litigation Strategies.” Perrin Conferences—Asbestos Litigation Conference: A National Overview & Outlook, September 28, 2015.
- “Emerging Issues, Coverage Trends and Key Jurisdictional Updates for 2015.” Perrin Conferences—Emerging Insurance Coverage & Allocation Issues, May 19, 2015.
- “National Trends Driving Asbestos Litigation.” Perrin Conferences—Asbestos Litigation Conference: A National Overview & Outlook, September 17, 2013.
- “Asbestos Bankruptcy Update.” Perrin Conferences—Asbestos Litigation Conference: A National Overview & Outlook, September 16, 2013.
- “Charting the Right Course in 2013: A Closer Look at This Year’s Emerging Insurance Coverage Issues.” Perrin Conferences—Emerging Insurance Coverage & Allocation Issues in 2013, May 14, 2013.
- “National Trends Driving Asbestos Litigation.” Perrin Conferences—Asbestos Litigation Conference: A National Overview & Outlook, September 10, 2012.
- “Mathematical Estimates of Carrier Exposures.” Perrin Conferences—Emerging Insurance Coverage & Allocation Issues, February 23, 2012.
- “Quantifying the Exposure: Reinsurance, Reserves, and Practical Considerations.” Perrin Conferences—Emerging Insurance Coverage & Allocation Issues, January 24, 2011.
- “Adding Up the Parts—Settlement Offsets in All Sums Jurisdictions.” Perrin Conferences—Emerging Insurance Coverage & Allocation Issues, January 24, 2011.
- “Impact of Current Tort Environment on Asbestos Reserves.” 2010 Casualty Actuary Society Annual Meeting, November 8, 2010.
- “Litigating Asbestos Cases in 2010: National Trends Driving the Litigation.” Perrin Conferences—Asbestos Litigation Conference: A National Overview & Outlook, September 13, 2010.
- “Trusts On-Line: The Impact of Asbestos Bankruptcies on the Tort System.” Perrin Conferences—Asbestos Bankruptcy Conference, June 21, 2010.
- “Asbestos Litigation in 2010 & Beyond—Current and Emerging Trends.” Perrin Conferences—Cutting Edge Issues in Asbestos Litigation, February 25–26, 2010.
- “A National Update on Current Cases & Trends that are Driving Asbestos Bankruptcy Litigation.” Perrin Teleconference Series, December 1, 2009.
- “Asbestos Bankruptcy: New Filings, Confirmations & Dismissals.” Perrin Conferences—Asbestos Litigation Mega Conference, September 14–16, 2009.

- “Claims Estimation in Mass Tort Cases.” ABA Section of Business Law Spring Meeting Committee on Business Bankruptcy, April 16–18, 2009.
- “Role of the Bankruptcy Trusts in Civil Asbestos.” BVR Legal/Mealey’s Emerging Trends in Asbestos Litigation Conference, March 9–11, 2009.
- “Damages in a Bad Faith Case.” BVR Legal/Mealey’s Bad Faith Litigation Conference, November 6–7, 2008.
- “Emerging Issues and Important Developments.” West Legalworks, Insurance and Reinsurance Allocation 2008: A Comprehensive Workshop, June 12, 2008.
- “Impact of Underlining Litigation Developments.” West Legalworks, Insurance and Reinsurance Allocation, November 7, 2007.
- “Removing the Asbestos Overhang—Is There an Alternative to Asbestos Bankruptcy?” Mealey’s Publications, Mealey’s National Asbestos Litigation SuperConference, September 26, 2007.
- “Another Chapter in Asbestos Bankruptcy Litigation: What Does the Future Hold?” Mealey’s Publications, Asbestos Bankruptcy Conference, June 8, 2007.
- “Impact of Underlining Litigation Developments.” West Legalworks, Insurance and Reinsurance Allocation Superbowl 2007, March 20, 2007.
- “Quantifying the Risk: The Impact Investigations into Fraudulent Silica/Asbestos Suits Will Have on the Rate of Filing and Value of Current & Future Claims.” Mealey’s Publications, Silica & Asbestos Claims Conference: What Effect Will Investigations into Fraudulent Suits Have on the Litigation? November 11, 2006.
- “How State and Federal Tort-Reform Efforts Are Changing the Asbestos Litigation Landscape.” Mealey’s Teleconference: Asbestos Legislation—Is a Solution to the Crisis around the Corner? July 20, 2006.
- “Asbestos Legislative Initiatives for Federal and State Tort Reform.” American Conference Institute’s (ACI) 7th Annual Litigating, Settling, and Managing Asbestos Claims, June 15, 2006.
- “The FAIR Act: An Economic Analysis.” American Legislative Exchange Council, 2005 States and Nation Policy Summit, December 2005.
- “The Impact of Different Approaches to Settlement Credits.” Mealey’s Publications, All Sums: Reallocation & Settlement Credits Conference, November 7, 2005.
- “Assessing the Merits of Reallocation.” American Enterprise Institute, Industry Roundtable Discussion, April 21, 2005.
- “The Effect of Joint and Several Liability on the Incentive of Defendants to Declare Bankruptcy: Evidence from Asbestos Litigation.” American Law and Economics Association, Annual Meeting, May 2004.
- “Assessing the Merits of Reallocation.” American Law and Economics Association, 14th Annual Meeting (with Anup Malani), May 3, 2004.

PUBLICATIONS

- Mullin, Charles H., Karl N. Snow, and Noah B. Wallace. “Unresolved Issues in Allocation of Loss to Insurance.” *Coverage* 21, no. 1 (2011): 13–23.
- Mullin, Charles H., Karl N. Snow, and Noah B. Wallace. “Proper Settlement Credits in All Sums Jurisdictions.” *Coverage* 20, no. 3 (2010): 26–31.

- Mullin, Charles H., Charles E. Bates, and Marc Scarella. "The Claiming Game." *Mealey's Litigation Report: Asbestos* 25, no. 1 (2010).
- Mullin, Charles H., Charles E. Bates, and A. Rachel Marquardt. "The Naming Game." *Mealey's Litigation Report: Asbestos* 24, no. 15 (2009).
- Mullin, Charles H., and Charles E. Bates. "State of the Asbestos Litigation Environment." *Mealey's Litigation Report: Asbestos* 23 no. 19 (2008).
- Mullin, Charles H., and Charles E. Bates. "Show Me the Money." *Mealey's Litigation Report: Asbestos* 22, no. 21 (2007).
- Mullin, Charles H., and Charles E. Bates. "The Bankruptcy Wave of 2000—Companies Sunk by an Ocean of Recruited Asbestos Claims." *Mealey's Litigation Report: Asbestos* 21, no. 24 (2007).
- Mullin, Charles H., and Charles E. Bates. "Having Your Tort and Eating It Too?" *Mealey's Asbestos Bankruptcy Report* 6, no. 4 (2006).
- Mullin, Charles H. "Identification and Estimation with Contaminated Data: When Do Covariate Data Sharpen Inference?" *Journal of Econometrics* 130, no. 2 (2006): 253–72.
- Mullin, Charles H., and David H. Reiley. "Recombinant Estimation for Normal-Form Games, with Applications to Auctions and Bargaining." *Games and Economic Behavior* 54, no. 1 (2006): 159–82.
- Mullin, Charles H. "Bounding Treatment Effects with Contaminated and Censored Data: Assessing the Impact of Early Childbearing on Children." *Advances in Economic Analysis & Policy* 5, no. 1, (2005): article 8.
- Mullin, Charles H., Kelly A. Dugan, and John J. Siegfried. "Undergraduate Financial Aid and Subsequent Alumni Giving Behavior." *Quarterly Review of Economics and Finance* 45, no. 1 (2005): 123–43.
- Mullin, Charles H., and Anandi Mani. "Choosing the Right Pond: Social Approval and Occupational Choice." *Journal of Labor Economics* 22, no. 4 (2004): 835–62.
- Mullin, Charles H., V. Joseph Hotz, and John K. Scholz. "Welfare, Employment, and Income: Evidence on the Effects of Benefit Reductions from California." *American Economic Review* 92, no. 2 (2002): 380–84.
- Mullin, Charles H., V. Joseph Hotz, and John K. Scholz. "Welfare Reform, Employment and Advancement." *Focus* 22, no. 1, Special Issue (2002).
- Mullin, Charles H., V. Joseph Hotz, and John K. Scholz. "The Earned Income Tax Credit and Labor Market Participation of Families on Welfare." In *The Incentives of Government Programs and the Well-Being of Families*, eds. Bruce Meyer and Greg Duncan (Evanston, IL: Joint Center for Poverty Research, 2001).
- Mullin, Charles H., V. Joseph Hotz, and John K. Scholz. "The Earned Income Tax Credit and Labor Market Participation of Families on Welfare." *Poverty Research News* (May/June 2001).
- Mullin, Charles H., and John J. Siegfried. "Grants Today, Gifts Tomorrow." *Currents* 27, no. 4 (2001): 9–10.
- Mullin, Charles H., Carolyn J. Hill, V. Joseph Hotz, and John K. Scholz. "EITC Eligibility, Participation, and Compliance Rates for AFDC Households: Evidence from the California Caseload," May 1999, prepared for the State of California.
- Mullin, Charles H., V. Joseph Hotz, and Seth Sanders. "Bounding Causal Effects Using Data from a Contaminated Natural Experiment: Analyzing the Effects of Teenage Childbearing." *Review of Economic Studies* 64, no. 4 (1997): 575–603.

GRANTS

- 2004–2007: Principal Investigator (with V. J. Hotz and J. K. Scholz), National Science Foundation Grant, “Tax Policy and Low-Wage Labor Markets: New Work on Employment, Effectiveness and Administration.”
- 2000–2001: Principal Investigator (with V. J. Hotz and J. K. Scholz), Grant to the University of Wisconsin–Madison from Assistant Secretary of Planning and Evaluation, US Department of Health and Human Services.
- 1997–1998: National Institutes of Health Predoctoral Training Grant.

PROFESSIONAL ASSOCIATIONS AND HONORS

- *Who's Who Legal*: Insurance Expert of the Year, 2018–2020
- *Who's Who Legal* Thought Leader: Global Elite list, 2019–present
- *Who's Who Legal*: Insurance & Reinsurance Expert Witnesses Thought Leader, 2016–present
- *Who's Who Legal*: Insurance & Reinsurance Expert Witnesses Global Elite Thought Leader, 2020–present
- American Bar Association
- American Economic Association
- American Law and Economics Association
- Econometric Society
- Society of Labor Economists

EXHIBIT 2

Interested Parties List

LTL Management LLC
Potentially Interested Parties

Debtor

LTL Management LLC

Direct Equity Owner of Debtor

Johnson & Johnson Holdco (NA) Inc.

Debtor's Direct Non-Debtor Subsidiary

Royalty A&M LLC

Other Non-Debtor Affiliates

3Dintegrated ApS
ABD Holding Company, Inc.
ABIOMED R&D, Inc.
ABIOMED, Inc.
Acclarent, Inc.
Actelion Ltd
Actelion Pharmaceuticals Ltd
Actelion Pharmaceuticals Trading
(Shanghai) Co., Ltd.
Actelion Pharmaceuticals US, Inc.
Actelion Treasury Unlimited Company
Albany Street LLC
ALZA Corporation
Alza Land Management, Inc.
AMO (Hangzhou) Co., Ltd.
AMO (Shanghai) Medical Devices
Trading Co., Ltd.
AMO ASIA LIMITED
AMO Australia Pty Limited
AMO Canada Company
AMO Denmark ApS
AMO Development, LLC
AMO France
AMO Germany GmbH
AMO Groningen B.V.
AMO International Holdings
Unlimited Company
AMO Ireland
AMO Italy SRL
AMO Japan K.K.
AMO Manufacturing USA, LLC
AMO Netherlands BV
AMO Nominee Holdings, LLC
AMO Norway AS
AMO Puerto Rico Manufacturing, Inc.
AMO Sales and Service, Inc.
AMO Singapore Pte. Ltd.
AMO Spain Holdings, LLC
AMO Switzerland GmbH
AMO United Kingdom, Ltd.
AMO Uppsala AB
Anakuria Therapeutics, Inc.
AorTx, Inc.
Apsis SAS
Aragon Pharmaceuticals, Inc.
Asia Pacific Holdings, LLC
Atrionix, Inc.
AUB Holdings LLC
Auris Health, Inc.
Backsvalan 6 Handelsbolag
Beijing Dabao Cosmetics Co., Ltd.
BeneVir BioPharm, Inc.
Berna Rhein B.V.
BioMedical Enterprises, Inc.
Biosense Webster (Israel) Ltd.
Biosense Webster, Inc.
Breethe, Inc.
C Consumer Products Denmark ApS, n/k/a
Coloplast Konsumerntvarer A/S
Carlo Erba OTC S.r.l.
Centocor Biologics, LLC
Centocor Research & Development, Inc.
Cerenovus, Inc.
ChromaGenics B.V.
Ci:z. Labo Co., Ltd.
Cilag AG
Cilag GmbH International
Cilag Holding AG
Cilag Holding Treasury Unlimited Company
Cilag-Biotech, S.L.
Coherex Medical, Inc.
ColBar LifeScience Ltd.
Consumer Test Entity
Cordis de Mexico, S.A. de C.V.
Corimmun GmbH
CoTherix Inc.

CRES Holdings, Inc.	Hansen Medical International, Inc.
CrossRoads Extremity Systems, LLC	Hansen Medical UK Limited
CSATS, Inc.	Hansen Medical, Inc.
Debs-Vogue Corporation	Healthcare Services (Shanghai) Ltd.
(Proprietary) Limited	I.D. Acquisition Corp.
DePuy Hellas SA	Innomedic Gesellschaft für innovative Medizintechnik und Informatik mbH
DePuy International Limited	J & J Company West Africa Limited
DePuy Ireland Unlimited Company	J&J Argentina S.A.
DePuy Mexico, S.A. de C.V.	J&J Pension Trustees Limited
DePuy Mitek, LLC	J&J Productos Medicos & Farmaceuticos del Peru S.A.
DePuy Orthopaedics, Inc.	J.C. General Services BV
DePuy Products, Inc.	Janssen Biologics (Ireland) Limited
DePuy Spine, LLC	Janssen Biologics B.V.
DePuy Synthes Institute, LLC	Janssen BioPharma, LLC
DePuy Synthes Products, Inc.	Janssen Biotech, Inc.
DePuy Synthes Sales, Inc.	Janssen Cilag Farmaceutica S.A.
DePuy Synthes, Inc.	Janssen Cilag S.p.A.
Dutch Holding LLC	Janssen Cilag SPA
ECL7, LLC	Janssen Cilag, C.A.
EES Holdings de Mexico, S. de R.L. de C.V.	Janssen Development Finance Unlimited Company
EES, S.A. de C.V.	Janssen Egypt LLC
EIT Emerging Implant Technologies GmbH	Janssen Farmaceutica Portugal Lda
Ethicon Endo-Surgery (Europe) GmbH	Janssen France Treasury Unlimited Company
Ethicon Endo-Surgery, Inc.	Janssen Global Services, LLC
Ethicon Endo-Surgery, LLC	Janssen Holding GmbH
Ethicon LLC	Janssen Inc.
Ethicon Sarl	Janssen Irish Finance Unlimited Company
Ethicon US, LLC	Janssen Japan Treasury Unlimited Company
Ethicon Women's Health & Urology Sarl	Janssen Korea Ltd.
Ethicon, Inc.	Janssen Mexico Treasury Unlimited Company
Ehnor (Proprietary) Limited	Janssen Oncology, Inc.
Ehnor del Istmo S.A.	Janssen Ortho LLC
Ehnor Farmaceutica, S.A.	Janssen Pharmaceutica (Proprietary) Limited
Finsbury (Development) Limited	Janssen Pharmaceutica NV
Finsbury (Instruments) Limited	Janssen Pharmaceutica S.A.
Finsbury Medical Limited	Janssen Pharmaceutical K.K.
Finsbury Orthopaedics International Limited	Janssen Pharmaceutical Sciences Unlimited Company
Finsbury Orthopaedics Limited	Janssen Pharmaceutical Unlimited Company
FMS Future Medical System SA	Janssen Pharmaceuticals, Inc.
GATT Technologies B.V.	
GH Biotech Holdings Limited	
Global Investment Participation B.V.	
GMED Healthcare BV	
Guangzhou Bioseal Biotech Co., Ltd.	
Hansen Medical Deutschland GmbH	

Janssen Products, LP	JNJ Holding EMEA B.V.
Janssen R&D Ireland Unlimited Company	JNJ International Investment LLC
Janssen Research & Development, LLC	JNTL (APAC) HoldCo 2 LLC
Janssen Sciences Ireland	JNTL (APAC) HoldCo 3 Pte. Ltd.
Unlimited Company	JNTL (APAC) HoldCo LLC
Janssen Scientific Affairs, LLC	JNTL (APAC) HoldCo Pte. Ltd.
Janssen Supply Group, LLC	JNTL (Japan) HoldCo Inc.
Janssen Vaccines & Prevention B.V.	JNTL (Malaysia) Sdn. Bhd.
Janssen Vaccines Corp.	JNTL (Middle East) HoldCo LLC
Janssen-Cilag	JNTL (Puerto Rico) HoldCo GmbH
Janssen-Cilag (New Zealand) Limited	JNTL (Shanghai) Investment Co., Ltd.
Janssen-Cilag A/S	JNTL (Switzerland) HoldCo GmbH
Janssen-Cilag AG	JNTL (Thailand) HoldCo LLC
Janssen-Cilag Aktiebolag	JNTL (UK) HoldCo Limited
Janssen-Cilag AS	JNTL Consumer Health (Belgium) BV
Janssen-Cilag B.V.	JNTL Consumer Health (Brazil) Ltda.
Janssen-Cilag d.o.o. Beograd	JNTL Consumer Health
Janssen-Cilag de Mexico S. de R.L. de C.V.	(Czech Republic) s.r.o.
Janssen-Cilag Farmaceutica Lda.	JNTL Consumer Health
Janssen-Cilag Farmaceutica Ltda.	(Dominican Republic), S.A.S.
Janssen-Cilag GmbH	JNTL Consumer Health (Finland) Oy
Janssen-Cilag International NV	JNTL Consumer Health (France) SAS
Janssen-Cilag Kft.	JNTL Consumer Health (Hungary) Kft
Janssen-Cilag Limited	JNTL Consumer Health (India)
Janssen-Cilag Manufacturing, LLC	Private Limited
Janssen-Cilag NV	JNTL Consumer Health
Janssen-Cilag OY	(New Zealand) Limited
Janssen-Cilag Pharma GmbH	JNTL Consumer Health (Norway) AS
Janssen-Cilag Pharmaceutical S.A.C.I.	JNTL Consumer Health (Philippines) Inc.
Janssen-Cilag Polska, Sp. z o.o.	JNTL Consumer Health (Poland) sp. z o.o.
Janssen-Cilag Pty Ltd	JNTL Consumer Health (Portugal) Limitada
Janssen-Cilag S.A.	JNTL Consumer Health (Services) LLC
Janssen-Cilag s.r.o.	JNTL Consumer Health (Slovakia), s.r.o.
Janssen-Cilag, S.A.	JNTL Consumer Health (Spain), S.L.
Janssen-Cilag, S.A. de C.V.	JNTL Consumer Health (Taiwan) Limited
Janssen-Pharma, S.L.	JNTL Consumer Health (Vietnam) Co. Ltd.
J-C Health Care Ltd.	JNTL Consumer Health General
Jevco Holding, Inc.	Services BV
JJ Surgical Vision Spain, S.L.	JNTL Consumer Health I (Ireland) Limited
JJC Acquisition Company B.V.	JNTL Consumer Health I
JJHC, LLC	(Switzerland) GmbH
JJSV Belgium BV	JNTL Consumer Health II
JJSV Manufacturing Malaysia SDN. BHD.	(Switzerland) GmbH
JJSV Norden AB	JNTL Consumer Health LLC
JJSV Produtos Oticos Ltda.	JNTL Consumer Health Mexico,
JNJ Global Business Services s.r.o.	S. de R.L. de C.V.

JNTL Consumer Health Middle East FZ-LLC	Johnson & Johnson China Ltd.
JNTL HoldCo 2 LLC	Johnson & Johnson Consumer (Hong Kong) Limited
JNTL HoldCo 3 LLC	Johnson & Johnson Consumer (Thailand) Limited
JNTL HoldCo 4 LLC	Johnson & Johnson Consumer B.V.
JNTL HoldCo 5 LLC	Johnson & Johnson Consumer Holdings France
JNTL HoldCo 6 LLC	Johnson & Johnson Consumer Inc.
JNTL HoldCo 7 LLC	Johnson & Johnson Consumer NV
JNTL HoldCo 8 LLC	Johnson & Johnson Consumer Saudi Arabia Limited
JNTL HoldCo LLC	Johnson & Johnson Consumer Services EAME Ltd.
JNTL Holdings 2, Inc.	Johnson & Johnson d.o.o.
JNTL Holdings 3, Inc.	Johnson & Johnson de Argentina S.A.C. e. I.
JNTL Holdings B.V.	Johnson & Johnson de Chile S.A.
JNTL Holdings, Inc.	Johnson & Johnson de Colombia S.A.
JNTL Ireland HoldCo 2 B.V.	Johnson & Johnson de Mexico, S.A. de C.V.
JNTL Netherlands HoldCo B.V.	Johnson & Johnson de Uruguay S.A.
JNTL Turkey Tüketicisi Sağlığı Limited Şirketi	Johnson & Johnson de Venezuela, S.A.
Johnson & Johnson	Johnson & Johnson del Ecuador, S.A.
Johnson & Johnson - Societa' Per Azioni	Johnson & Johnson Del Paraguay, S.A.
Johnson & Johnson (Angola), Limitada	Johnson & Johnson del Peru S.A.
Johnson & Johnson (Australia) Pty Ltd	Johnson & Johnson do Brasil Industria E
Johnson & Johnson (Canada) Inc.	Comercio de Produtos Para Saude Ltda.
Johnson & Johnson (China) Investment Ltd.	Johnson & Johnson Dominicana, S.A.S.
Johnson & Johnson (Ecuador) S.A.	Johnson & Johnson Enterprise
Johnson & Johnson (Egypt) S.A.E.	Innovation Inc.
Johnson & Johnson (Hong Kong) Limited	Johnson & Johnson European Treasury
Johnson & Johnson (Ireland) Limited	Unlimited Company
Johnson & Johnson (Jamaica) Limited	Johnson & Johnson Finance Corporation
Johnson & Johnson (Kenya) Limited	Johnson & Johnson Finance Limited
Johnson & Johnson (Middle East) Inc.	Johnson & Johnson Financial
Johnson & Johnson (Mozambique), Limitada	Services GmbH
Johnson & Johnson (Namibia) (Proprietary) Limited	Johnson & Johnson for Export and
Johnson & Johnson (New Zealand) Limited	Import LLC
Johnson & Johnson (Philippines), Inc.	Johnson & Johnson Gateway, LLC
Johnson & Johnson (Private) Limited	Johnson & Johnson Gesellschaft m.b.H.
Johnson & Johnson (Singapore) Holdco LLC	Johnson & Johnson GmbH
Johnson & Johnson (Thailand) Ltd.	Johnson & Johnson GT, Sociedad Anónima
Johnson & Johnson (Trinidad) Limited	Johnson & Johnson Guatemala, S.A.
Johnson & Johnson (Vietnam) Co., Ltd	Johnson & Johnson Health and Wellness
Johnson & Johnson AB	Solutions, Inc.
Johnson & Johnson AG	Johnson & Johnson Health Care
Johnson & Johnson Bulgaria EOOD	Systems Inc.

Johnson & Johnson Hellas Commercial and Industrial S.A.
Johnson & Johnson Hellas Consumer Products Commercial Societe Anonyme
Johnson & Johnson Hemisferica S.A.
Johnson & Johnson Holdco (NA) Inc.
Johnson & Johnson Holding GmbH
Johnson & Johnson Holdings (Austria) GmbH
Johnson & Johnson Inc.
Johnson & Johnson Industrial Ltda.
Johnson & Johnson Innovation - JJDC, Inc.
Johnson & Johnson Innovation Limited
Johnson & Johnson Innovation LLC
Johnson & Johnson International
Johnson & Johnson International (Singapore) Pte. Ltd.
Johnson & Johnson International Financial Services Unlimited Company
Johnson & Johnson Irish Finance Company Limited
Johnson & Johnson K.K.
Johnson & Johnson Kft.
Johnson & Johnson Korea Selling & Distribution LLC
Johnson & Johnson Korea, Ltd.
Johnson & Johnson Limited
Johnson & Johnson LLC
Johnson & Johnson Luxembourg Finance Company Sarl
Johnson & Johnson Management Limited
Johnson & Johnson Medical (China) Ltd.
Johnson & Johnson Medical (Proprietary) Ltd
Johnson & Johnson Medical (Shanghai) Ltd.
Johnson & Johnson Medical (Suzhou) Ltd.
Johnson & Johnson Medical B.V.
Johnson & Johnson Medical Devices & Diagnostics Group - Latin America, L.L.C.
Johnson & Johnson Medical GmbH
Johnson & Johnson Medical Greece Single Member S.A.
Johnson & Johnson Medical Korea Ltd.
Johnson & Johnson Medical Limited
Johnson & Johnson Medical Mexico, S.A. de C.V.
Johnson & Johnson Medical NV
Johnson & Johnson Medical Products GmbH
Johnson & Johnson Medical Pty Ltd
Johnson & Johnson Medical S.A.
Johnson & Johnson Medical S.p.A.
Johnson & Johnson Medical SAS
Johnson & Johnson Medical Saudi Arabia Limited
Johnson & Johnson Medical Taiwan Ltd.
Johnson & Johnson Medical, S.C.S.
Johnson & Johnson Medikal Sanayi ve Ticaret Limited Sirketi
Johnson & Johnson MedTech (Thailand) Ltd.
Johnson & Johnson Medtech Colombia S.A.S.
Johnson & Johnson Middle East FZ-LLC
Johnson & Johnson Morocco Societe Anonyme
Johnson & Johnson Nordic AB
Johnson & Johnson Pacific Pty Limited
Johnson & Johnson Pakistan (Private) Limited
Johnson & Johnson Panama, S.A.
Johnson & Johnson Personal Care (Chile) S.A.
Johnson & Johnson Pharmaceutical Ltd.
Johnson & Johnson Poland Sp. z o.o.
Johnson & Johnson Private Limited
Johnson & Johnson Pte. Ltd.
Johnson & Johnson Pty. Limited
Johnson & Johnson Romania S.R.L.
Johnson & Johnson S.E. d.o.o.
Johnson & Johnson S.E., Inc.
Johnson & Johnson Sante Beaute France
Johnson & Johnson SDN. BHD.
Johnson & Johnson Services, Inc.
Johnson & Johnson Surgical Vision India Private Limited
Johnson & Johnson Surgical Vision, Inc.
Johnson & Johnson Taiwan Ltd.
Johnson & Johnson UK Treasury Company Limited

Johnson & Johnson Ukraine LLC
Johnson & Johnson Urban
Renewal Associates
Johnson & Johnson Vision Care
(Australia) Pty Ltd
Johnson & Johnson Vision Care
(Shanghai) Ltd.
Johnson & Johnson Vision Care Ireland
Unlimited Company
Johnson & Johnson Vision Care, Inc.
Johnson & Johnson Vision Korea, Ltd.
Johnson & Johnson, Lda
Johnson & Johnson, S.A.
Johnson & Johnson, S.A. de C.V.
Johnson & Johnson, s.r.o.
Johnson & Johnson, s.r.o.
Johnson and Johnson (Proprietary) Limited
Johnson and Johnson Sihhi Malzeme Sanayi
Ve Ticaret Limited Sirketi
Johnson Y Johnson de Costa Rica, S.A.
JOM Pharmaceutical Services, Inc.
Kenvue Inc.
La Concha Land Investment Corporation
McNeil AB
McNeil Consumer Pharmaceuticals Co.
McNeil Denmark ApS
McNeil Healthcare (Ireland) Limited
McNeil Healthcare (UK) Limited
McNeil Healthcare LLC
McNeil Iberica S.L.U.
McNeil LA LLC
McNEIL MMP, LLC
McNeil Nutritionals, LLC
McNeil Panama, LLC
McNeil Products Limited
McNeil Sweden AB
Medical Device Business Services, Inc.
Medical Devices & Diagnostics
Global Services, LLC
Medical Devices International LLC
Medos International Sarl
Medos Sarl
MegaDyne Medical Products, Inc.
Menlo Care De Mexico, S.A. de C.V.
Mentor B.V.
Mentor Deutschland GmbH
Mentor Medical Systems B.V.
Mentor Partnership Holding
Company I, LLC
Mentor Texas GP LLC
Mentor Texas L.P.
Mentor Worldwide LLC
Middlesex Assurance Company Limited
Momenta Ireland Limited
Momenta Pharmaceuticals, Inc.
NeoStrata Company, Inc.
NeoStrata UG (haftungsbeschränkt)
Netherlands Holding Company
Neuravi Limited
NeuWave Medical, Inc.
Novira Therapeutics, LLC
NuVera Medical, Inc.
Obtech Medical Mexico, S.A. de C.V.
OBTECH Medical Sarl
OGX Beauty Limited
OMJ Holding GmbH
OMJ Pharmaceuticals, Inc.
Omrix Biopharmaceuticals Ltd.
Omrix Biopharmaceuticals NV
Omrix Biopharmaceuticals, Inc.
Ortho Biologics LLC
Ortho Biotech Holding LLC
Orthospin Ltd.
Orthotaxy SAS
Patriot Pharmaceuticals, LLC
Peninsula Pharmaceuticals, LLC
Percivia LLC
Pharmadirect Ltd.
Pharmedica Laboratories
(Proprietary) Limited
preCARDIA, Inc.
Princeton Laboratories, Inc.
Productos de Cuidado Personal y
de La Salud de Bolivia S.R.L.
Proleader S.A.
Prosidyan, Inc.
PT Integrated Healthcare Indonesia
PT Johnson & Johnson Indonesia
PT Johnson and Johnson Indonesia Two
Pulsar Vascular, Inc.
Regency Urban Renewal Associates
RespiVert Ltd.

Review Manager Test Entity 2
Royalty A&M LLC
Rutan Realty LLC
Scios LLC
Serhum S.A. de C.V.
Shanghai Elsker Mother & Baby Co., Ltd
Shanghai Johnson & Johnson Ltd.
Shanghai Johnson & Johnson
Pharmaceuticals Ltd.
Sodiac ESV
Spectrum Vision Limited Liability Company
Spectrum Vision Limited Liability
Partnership
SterilMed, Inc.
Surgical Process Institute
Deutschland GmbH
Synthes Costa Rica S.C.R., Limitada
SYNTHES GmbH
Synthes GmbH
Synthes Holding AG
Synthes Holding Limited
SYNTHES Medical Immobilien GmbH
Synthes Medical Surgical Equipment &
Instruments Trading LLC
Synthes Produktions GmbH
Synthes Proprietary Limited
Synthes S.M.P., S. de R.L. de C.V.
Synthes Tuttlingen GmbH
Synthes USA Products, LLC
Synthes USA, LLC
Synthes, Inc.
TARIS Biomedical LLC
TearScience, Inc.
The Anspach Effort, LLC
The Vision Care Institute, LLC
Tibotec, LLC
Torax Medical, Inc.
UAB "Johnson & Johnson"
Vania Expansion
Verb Surgical Inc.
Vision Care Finance Unlimited Company
Vogue International LLC
WH4110 Development Company, L.L.C.
Xian Janssen Pharmaceutical Ltd.
XO1 Limited
Zarbee's, Inc.

Managers and Officers of the Debtor

John Kim
Richard Dickinson
Robert Wuesthoff
Russell Deyo

**Major Current Business Affiliations of
Debtor's Managers**

American Foundation for Opioid
Alternatives
Migration Policy Institute
Miller Center for Community Protection &
Reliance, Eagleton Institute of Politics,
Rutgers University
National Center for State Courts
National Council, McLean Hospital
One Mind

Depository and Disbursement Banks

Bank of America, N.A.

Major Sureties

Chubb
Federal Insurance Company
Liberty Mutual Insurance Company
Travelers Casualty and Surety Company
of America

**Parties to Material Contracts With the
Debtor**

Johnson & Johnson
Johnson & Johnson Holdco (NA) Inc.
Johnson & Johnson Services, Inc.

**Significant Co-Defendants in
Talc-Related Litigation**

3M Company
A.O. Smith Corporation
Albertsons Companies, Inc.
Avon Products, Inc.
Barretts Minerals, Inc.
BASF Catalysts LLC
Block Drug Company, Inc.
Borg Warner Morse Tec, Inc.
Brenntag North America
Brenntag Specialties, Inc.

Bristol-Myers Squibb Company	Macy's, Inc.
Carrier Corporation	Mary Kay Inc.
Chanel, Inc.	Maybelline LLC
Charles B. Chrystal Co., Inc.	Metropolitan Life Insurance Company
Chattem, Inc.	Noxell Corporation
Colgate-Palmolive Company	Personal Care Products Council
Conopco Inc.	Pfizer, Inc.
Costco Wholesale Corporation	Pharma Tech Industries, Inc.
Coty, Inc.	Pneumo Abex, LLC
Crane Co.	PTI Royston, LLC
CVS Health Corporation	Publix Super Markets, Inc.
CVS Pharmacy, Inc.	R.T. Vanderbilt Holding Company, Inc.
Cyprus Amax Minerals Company	Ralphs Grocery Company
Cyprus Mines Corporation	Revlon Consumer Products Corporation
Dana Companies, LLC	Revlon, Inc.
DAP Products, Inc.	Rite Aid Corporation
Dollar General Corporation	Safeway, Inc.
Duane Reade Inc.	Sanofi-Aventis U.S. LLC
Eaton Corporation	Shulton, Inc.
Eli Lilly and Company	Specialty Minerals Inc.
Elizabeth Arden, Inc.	Target Corporation
Estee Lauder Inc.	The Dow Chemical Company
Family Dollar Stores Inc.	The Estee Lauder Companies, Inc.
Flowserve US, Inc.	The Kroger Co.
FMC Corporation	The Procter & Gamble Company
Food 4 Less of California, Inc.	Thrifty Payless, Inc.
Ford Motor Company	Unilever Home & Personal Care USA
Foster Wheeler, LLC	Union Carbide Corporation
Gardner Denver, Inc.	Vanderbilt Minerals, LLC
General Electric Company	ViacomCBS, Inc.
Genuine Parts Company	Walgreen Co.
Goodyear Tire & Rubber Co.	Walmart, Inc.
Goulds Pumps, LLC	Warren Pumps, LLC
Grinnell LLC	Whittaker Clark & Daniels, Inc.
Honeywell International, Inc.	Wyeth Holdings LLC
Imerys Talc America, Inc.	Yves Saint Laurent America, Inc.
Imerys USA, Inc.	
IMO Industries Inc.	
John Crane, Inc.	
K&B Louisiana Corporation	<u>Debtor's Proposed Professionals and</u>
Kaiser Gypsum Company, Inc.	<u>Claims Agent</u>
Kmart Corporation	AlixPartners LLP
Kolmar Laboratories	Bates White LLC
Longs Drug Stores California	Blake, Cassels & Graydon LLP
L'Oreal USA, Inc.	Epiq Corporate Restructuring LLC
Lucky Stores, Inc.	Hogan Lovells
	Jones Day
	King & Spalding LLP

McCarter & English, LLP
Orrick, Herrington, & Sutcliffe, LLP
Shook, Hardy & Bacon L.P.
Skadden, Arps, Slate, Meager & Flom LLP
Weil Gotshal & Manges LLP
Wollmuth Maher & Deutsch LLP

**Debtor's Proposed Significant Ordinary
Course Professionals, Consultants and
Service Providers**

Adler Pollock & Sheehan PC
Barrasso Usdin Kupperman
Freeman & Sarver, L.L.C.
Blank Rome LLP
Butler Snow LLP
Carlton Fields, P.A.
Chehady, Sherman, Williams,
Recile, & Hayes
Damon Key Leong Kupchak Hastert
Davis Hatley Haffeman & Tighe
Dechert LLP
Elliott Law Offices, PA
Faegre Drinker Biddle & Reath LLP
Foliart, Huff, Ottaway & Bottom
Gibson, Dunn & Crutcher LLP
Goldman Ismail Tomaselli Brennan &
Baum
Hartline Barger
HeplerBroom LLC
Irwin Fritchie Urquhart & Moore LLC
Johnson & Bell Ltd.
Jones, Skelton & Hochuli, P.L.C.
Kaplan, Johnson, Abate & Bird LLP
Kelley Jasons McGowan Spinelli
Hanna & Reber, LLP
Kirkland & Ellis LLP
Kitch Drutchas Wagner
Valitutti & Sherbrook
Lewis Brisbois Bisgaard & Smith, LLP
Manion Gaynor & Manning LLP
Manning Gross + Massenburg
Miles & Stockbridge
Milligan & Herns
Morgan Lewis
Nelson Mullins Riley & Scarborough, LLP
Nutter McClellan & Fish LLP

Patterson Belknap Webb & Tyler LLP
Proskauer Rose LLP
Quattlebaum, Grooms & Tull PLLC
Schnader Harrison Segal & Lewis
Schwabe Williamson & Wyatt
Sills Cummis & Gross P.C.
Stoel Rives LLP
Sullivan Whitehead & Deluca LLP
Swartz Campbell LLC
The Weinhardt Law Firm
Tucker Ellis LLP
Willcox & Savage, P.C.

**Known Professionals for Certain
Non-Debtor Parties in Interest**

Barnes & Thornburg, LLP
Cravath, Swaine & Moore
White & Case LLP

**Proposed Future Claimants',
Representative and Her Proposed
Professional**

Randi S. Ellis
Walsh Pizzi O'Reilly Falanga LLP

Material Potentially Indemnified Parties

Bausch Health Companies Inc.
Cyprus Mines Corporation
Cyprus Talc Corp.
Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
Luzenac America, Inc.
Pharma Tech Industries, Inc.
PTI Royston, LLC
Rio Tinto America, Inc.
RTZ America, Inc.
Valeant Pharmaceuticals International, Inc.
Windsor Minerals Inc.
Costco Wholesale Corporation
Publix Super Markets, Inc.
Rite Aid Corporation
Safeway Inc.
Walmart Inc.

Parties Who Have Entered Into Plan Support Agreements

Andres Pereira Firm
Ferrer, Poirot & Wansbrough
Johnson Law Group
Liakos Law, APC
Linville Law Group
McDonald Worley
Nachawati Law Group
OnderLaw, LLC
Pulaski Kherkher PLLC
Rueb Stoller Daniel, LLP
Seeger Weiss LLP
Slater Slater Schulman LLP
Trammell PC
Watts Guerra LLP
Wisner Baum, LLP

Law Firms with Significant Representations of Talc Claimants

Andres Pereira Firm
Arnold & Itkin LLP
Aylstock, Witkin, Kreis & Overholtz, PLLC
Beasley Allen Law Firm
Childers, Schlueter & Smith LLC
Ferrer, Poirot & Wansbrough
Johnson Law Group
Linville Law Group
McDonald Worley
Miller Firm, LLC
Nachawati Law Group
Napoli Shkolnik PLLC
OnderLaw, LLC
Pulaski Kherkher PLLC
Robinson Calcagnie
Rueb Stoller Daniel, LLP
Sanders, Phillips, Grossman, LLC
Seeger Weiss LLP
Slater Slater Schulman LLP
Trammell PC
Wagstaff Law Firm
Watts Guerra LLP
Wisner Baum, LLP

Key Parties in *Imerys Talc America, Inc.* and *Cyprus Mines Corp.* Chapter 11 Cases

Cyprus Amax Minerals Company
Cyprus Mines Corporation
Cyprus Talc Corporation
Imerys S.A.
Imerys Talc America, Inc.
Imerys Talc Vermont, Inc.
(fka Windsor Minerals Inc.)
James L. Patton
Luzenac America, Inc.
Official Committee of Tort Claimants
(*In re Imerys Talc America, Inc.*)
Official Committee of Tort Claimants
(*In re Cyprus Mines Corp.*)
Roger Frankel

Debtor's Insurers

A.G. Securitas
ACE Property & Casualty Insurance Company
Aetna Casualty and Surety Company
Affiliated FM Ins. Company
AIG Europe S.A.
AIG Property and Casualty Company
AIU Ins. Company
Allianz Global Risks US Insurance Company
Allianz Ins. Company
Allstate Insurance Company
American Centennial Ins. Company
American Motorists Ins. Company
American Re-Insurance Company
Arrowood Indemnity Company
ASR Schadeverzekering N.V.
Assurances Generales De France
Assurantiekantoor VanWijk & Co.
Atlanta International Insurance Company,
n/k/a Wellfleet New York Insurance Company
Birmingham Fire Ins. Company of Pennsylvania
Central National Ins. Company of Omaha
Century Indemnity Company
Champion Dyeing Allocation Year
Chubb

City Ins. Company	N.V. Schadeverzekeringsmaatschappij
Colonia Versicherungs AG, Koln	National Casualty Company
Company of N.Y.	National Union Fire Ins. Company of
Continental Insurance Company	Pittsburgh, PA
Darag Deutsche Versicherungs-Und	Nationwide
Drake Ins. Company of New York	New Hampshire Ins. Company
Employers Ins. Company of Wausau	North River Ins. Company
Employers Ins. of Wausau	Northbrook Excess and Surplus
Employers Mutual Casualty Company	Ins. Company
Eurinco Allgemeine	Northeastern Fire Ins. Company
Everest Reinsurance Company	of Pennsylvania
Fireman's Fund Ins. Company	Pacific Employers Ins. Company
First State Ins. Company	ProSight
GAP	Prudential Reinsurance Company
Gibraltar Casualty Company	Puritan Insurance Company
Granite State Ins. Company	Republic Indemnity Company of America
Great American	Republic Ins. Company
Great Northern Ins. Company	Republic Western Ins. Company
Great Southwest Fire Ins. Company	Repwest Insurance Company
Groupe Drouot	Resolute Management Inc.
Harbor Ins. Company	Rheinland Versicherungen
Hartford Accident and Indemnity Company	Rheinland Verzekeringen
Home Ins. Company	Riverstone Insurers
Ideal Mutual Ins. Company	Royal Belge I.R., S.A. d'Assurances
Industrial Indemnity Company	Royal Indemnity Company
Ins. Company of North America	Royal Ins. Company
Ins. Company of the State of Pennsylvania	Rückversicherungs-AG
Ins. Corporation of Singapore Limited	Safety Mutual Casualty Corporation
Integrity Ins. Company	Safety National Casualty Corporation
International Ins. Company	Seguros La Republica SA
International Surplus Lines Ins. Company	Sentry Insurance A Mutual Company
Lexington Ins. Company	Southern American Ins. Company
London Guarantee and Accident	Starr Indemnity & Liability Company
L'Union Atlantique S.A. d'Assurances	TIG Insurance Company
Maas Lloyd	Transamerica Premier Insurance Company
Mead Reinsurance Corporation	Transit Casualty Company
Middlesex Assurance Company	Travelers Casualty and Surety Company
Midland Ins. Company	UAP
Midstates Reinsurance Corp.	Union Atlantique d'Assurances S.A.
Mission Ins. Company	Union Indemnity Ins. Company
Mission National Ins. Company	of New York
Munich Reinsurance America, Inc.	Versicherungs AG, Dusseldorf
Mutual Fire, Marine, & Inland Ins.	Westchester Fire Insurance Company
Company	Westport Insurance Corporation
N.V. De Ark	XL Ins. Company
N.V. Rotterdamse Assurantiekas	

Potential Parties in Canadian Proceeding

Cassels Brock & Blackwell LLP
Ernst & Young Inc.

States/Federal District With Consumer Protection Investigations/Actions

Alabama
Alaska
Arkansas
Arizona
Colorado
Connecticut
Delaware
Florida
Georgia
Hawaii
Idaho
Illinois
Iowa
Kansas
Kentucky
Maine
Maryland
Massachusetts
Michigan
Minnesota
Mississippi
Montana
Nebraska
Nevada
New Hampshire
New Jersey
New Mexico
New York
North Carolina
North Dakota
Ohio
Oklahoma
Oregon
Rhode Island
South Dakota
Texas
Utah
Vermont
Virginia
Washington

Washington, D.C.
West Virginia
Wisconsin

The Office of the United States Trustee – Region 3 – District of New Jersey

Adam Shaarawy
Adela Alfaro
Alexandria Nikolinos
Angeliza Ortiz-Ng
Daniel C. Kropiewnicki
David Gerardi
Fran B. Steele
Francyne D. Arendas
James Stives
Jeffrey Sponder
Joseph C. Kern
Kirsten K. Ardelean
Lauren Bielskie
Maggie McGee
Martha Hildebrandt
Michael Artis
Neidy Fuentes
Peter J. D'Auria
Robert J. Schneider, Jr.
Tia Green
Tina L. Oppelt
William J. Ziemer

Bankruptcy Judges for the District of New Jersey

Judge Andrew B. Altenburg, Jr.
Judge Christine M. Gravelle
Judge Jerrold N. Poslusny, Jr.
Judge John K. Sherwood
Judge Kathryn C. Ferguson
Judge Michael B. Kaplan
Judge Rosemary Gambardella
Judge Stacey L. Meisel
Judge Vincent F. Papalia

EXHIBIT 3

**Schedule of Bates White Prior or Current Affiliations
For Services Provided for or on behalf of Interested Parties¹**

3M Company
ACE Property and Casualty Insurance Company
Actelion Pharmaceuticals Ltd.
Aetna Casualty and Surety Company
Affiliated FM Ins. Company
AIG Property and Casualty Company
AIU Ins. Company
Alabama
Alaska
Allianz Ins. Company
Allstate Insurance Company
American Re-insurance Company
Arkansas
Arrowood Indemnity Company
Barnes & Thornburg, LLP
BASF Catalysts LLC
Bausch Health Companies Inc.
Birmingham Fire Ins. Company of Pennsylvania
Blank Rome LLP
Brenntag North America
Bristol-Myers Squibb Company
Carrier Corporation
Century Indemnity Company
Chubb
Colgate-Palmolive Company
Colorado
Connecticut
Conopco Inc.
Continental Insurance Company
Costco Wholesale Corporation
Crane Co.
Cravath, Swaine & Moore
CVS Health Corporation
CVS Pharmacy, Inc.
Dechert LLP
Delaware
Eaton Corporation
Eli Lilly and Company
Employers Ins. Company of Wausau

¹ Prior affiliations include services provided in the last ten years.

Estee Lauder Inc.
Everest Reinsurance Company
Faegre Drinker Biddle & Reath LLP
Federal Insurance Company
Fireman's Fund Ins. Company
First State Ins. Company
Florida
Ford Motor Company
Foster Wheeler, LLC
General Electric Company
Georgia
Gibraltar Casualty Company
Gibson, Dunn & Crutcher LLP
Goodyear Tire & Rubber Co.
Granite State Ins. Company
Great American
Harbor Ins. Company
Hartford Accident and Indemnity Company
Hawaii
Hogan Lovells
Home Ins. Company
Honeywell International, Inc.
Idaho
Illinois
IMO Industries, Inc.
Ins. Company of North America
Ins. Company of the State of Pennsylvania
International Ins. Company
International Surplus Lines Ins. Company
Iowa
Janssen Biotech
Janssen Pharmaceuticals
Janssen Research & Development, LLC
John Crane, Inc.
Johnson & Johnson
Johnson & Johnson Consumer Inc.
Johnson & Johnson Services, Inc.
Jones Day
Kansas
Kentucky
King & Spalding LLP
Kirkland & Ellis LLP
Kmart Corporation
Lewis Brisbois Bisgaard & Smith, LLP
Lexington Ins. Company
Liberty Mutual Insurance Company

LTL Management LLC
Maine
Maryland
Massachusetts
McCarter & English, LLP
Michigan
Minnesota
Mississippi
Morgan Lewis
Munich Reinsurance
Napoli Shkolnik PLLC
National Casualty Company
National Union Fire Ins. Company of Pittsburgh, PA
Nationwide
Nebraska
Nelson Mullins Riley & Scarborough, LLP
New Hampshire
New Hampshire Ins. Company
New Jersey
New Mexico
New York
North Carolina
North River Ins. Company
Northbrook Excess and Surplus Ins. Company
Northeastern Fire Ins. Company of Pennsylvania
Ohio
Oklahoma
Oregon
Orrick, Herrington, & Sutcliffe, LLP
Patterson Belknap Webb & Tyler LLP
Pfizer, Inc.
Pneumo Abex LLC
Proskauer Rose LLP
Prudential Reinsurance Company
Republic Insurance Company
Resolute Management Inc.
Rhode Island
Rite Aid Corporation
Rio Tinto
Riverstone Insurers
Royal Indemnity Company
Sanofi-Aventis
Shook, Hardy & Bacon L.L.P.
Sidley Austin LLP
Skadden, Arps, Slate, Meager & Flom LLP
South Dakota

Starr Indemnity & Liability Company
Stoel Rives LLP
Target Corporation
Texas
The Dow Chemical Company
The Estee Lauder Companies, Inc.
The Procter & Gamble Company
TIG Insurance Company
Travelers Casualty and Surety Company
Travelers Casualty and Surety Company of America
Union Carbide Corporation
Utah
Valeant Pharmaceuticals International, Inc.
Vermont
ViacomCBS, Inc.
Virginia
Walmart, Inc.
Warren Pumps, LLC
Washington
Washington, DC
Weil, Gotshal & Manges LLP
West Virginia
Westchester Fire Insurance Company
Westport Insurance Corporation
White & Case LLP
Wisconsin
Wollmuth Maher & Deutsch LLP